

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re: U LOCK INC. a/k/a)	
U-LOCK INC.)	Bank. 22-20823-GLT
)	
Debtor.)	Chapter 7
)	
-----)	
CHRISTINE BIROS,)	
)	
Movant,)	
)	
v.)	
)	
SHANNI SNYDER,)	
)	
Respondent.)	

**NOTICE OF PARTIAL NON-OBJECTION TO LIMITED RELIEF FROM THE
STAY¹**

Alleged Debtor U Lock Inc. (“U Lock”), by and through its undersigned counsel, notifies the Court that it does not object to limited relief from the stay as to the following environmental concerns, and the Court may render an Order without objection from U Lock as to the following:

1. **TRAILERS:** Christine Biros may cause the removal of the trailers pictured in Exhibit A, which do not belong to U Lock, and that were placed at 14140 Route 30, North Huntingdon, Pennsylvania, in 2017 by the father of Ms. Biros. This removal can occur on forty-eight hours notice.
2. **VEHICLES:** U Lock shall move the vehicles on the property within ten (10) days of the police placing “tags” on them authorizing it to do so. U Lock will escrow any funds received from salvage or scrap payments as to the vehicles. U Lock consents to Christine Biros or her attorneys assisting, facilitating, or demanding the police move

¹ U Lock the Court of this limited non-objection in the event that the parties cannot come to an agreement as to environmental matters.

forward with the tagging process. If the tagging process cannot be completed, U Lock will confer in good faith with counsel for Ms. Biros.

3. **GARBAGE TRUCK INCIDENT:** As U Lock does not believe it suffered any damage from the so-called Garbage Truck Incident, relief from the stay can be granted for Christine Biros to test the ground, take photographs, lodge an insurance claim with the waste management company that caused the accident, or initiate any legal action against that third-party related to the incident.
4. **TIRES AND OBVIOUS WASTE:** As to the approximately 300 tires that are presently² on either the neighboring property, or the property in question, U Lock shall, within fourteen (14) days, determine whether the tires are on the property at 14140 Route 30 or the neighboring property. If the tires are on the 14140 Route 30 property, it shall not be a violation of the automatic stay for Ms. Biros to remove said tires.
5. **TANKS:** Within fourteen days, U Lock will itemize the tanks that are on the property, listing them as unused, salvageable, or waste, and disclose the same to Ms. Biros. The unused tanks and salvageable tanks will be removed from the property within twenty-one (21) days. If they are sold, U Lock will escrow the funds pending further Order of Court.
6. **ENVIRONMENTAL TESTING AND REMEDIATION PLANNING:** As to non-emergency and long term environmental concerns, it shall not be a violation of the automatic stay for Ms. Biros to, on forty-eight hours notice, enter the property with licensed contractors to conduct *bona fide* environmental testing and/or to create plans for remediation.

² These tires existed on the property since the purchase in 2015.

Respectfully submitted,

/s/ J. Allen Roth, Esq.

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